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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

ENNIA Caribe Holding N.V., *et al.*,¹

Debtors in a Foreign Proceeding.

Chapter 15

Case No. 18-12908 (MG)

(Jointly Administered)

**DECLARATION OF ADAM L. SHPEEN IN SUPPORT OF THE
FOREIGN REPRESENTATIVE'S SUPPLEMENTAL BRIEF IN
SUPPORT OF THE FOREIGN REPRESENTATIVE'S PETITION FOR AN
ORDER GRANTING RECOGNITION OF A FOREIGN PROCEEDING**

¹ The debtors in these chapter 15 cases, along with each debtor's trade register number, are: ENNIA Caribe Holding N.V. (trade register number 63986) ("**ECH**"), EC Holding N.V. (trade register number 138313) ("**EC Holding**"), ENNIA Caribe Leven N.V. (trade register number 36875) ("**ECL**"), ENNIA Caribe Zorg N.V. (trade register number 51811) ("**ECZ**"), ENNIA Caribe Schade N.V. (trade register number 63987) ("**ECS**") and EC Investments B.V. (trade register number 99988) ("**ECI**," and, together with ECH, EC Holding, ECL, ECZ and ECS, the "**ENNIA Group**" or "**Debtors**"). The mailing address of the lead debtor in these chapter 15 cases, ECH, is John B. Gorsiraweg 6, Willemstad, Curaçao.

Under 28 U.S.C. § 1746, I, Adam L. Shpeen, declare as follows under the penalty of perjury:

1. I am an attorney admitted in these chapter 15 cases, and am an associate with the law firm of Davis Polk & Wardwell LLP (“**Davis Polk**”). Davis Polk maintains offices at, among other places, 450 Lexington Avenue, New York, NY 10017.

2. I submit this declaration in support of the *Foreign Representative’s Supplemental Brief in Support of the Foreign Representative’s Petition for an Order Granting Recognition of a Foreign Proceeding*.

3. Attached hereto are true and correct copies of the following:

Exhibit:	Exhibit Letter:
Supplemental Declaration of Sabine Altena, dated November 20, 2018	A
Declaration of Professor Arthur Hartkamp, dated November 20, 2018	B
Statement of Defense Preliminary Relief Proceedings, hearing held on November 21, 2018	C
Transcript of Sabine Altena Deposition, held on November 29, 2018	D
Supplemental Declaration of Bouke Boersma, dated November 20, 2018	E
Transcript of Bouke Boersma Deposition, held on November 28, 2018	F
Transcript of Professor Arthur Hartkamp Deposition, held on December 4, 2018	G
Transcript of Gerhard Gispen Deposition, held on December 5, 2018	H
Declaration of Gerhard Gispen, dated November 20, 2018	I
Transcript of July 5 Press Conference Provided by Counsel to Parman as an Exhibit to Supplemental Declaration of Bouke Boersma, dated November 20, 2018	J
Curaçao Civil Code Art. 7A.1615w	K
Court Order Terminating Employment Agreement with ECH Chief Financial Officer, dated November 28, 2018	L

I declare under penalty of perjury that the foregoing is true and correct on this 6th day of December 2018.

/s/ Adam L. Shpeen
Adam L. Shpeen